

ORIGINAL

Eric Fishman
202 828 1849
eric.fishman@hklaw.com

December 21, 2004

Federal Express Delivery

South Dakota Public Utilities Commission
Capitol Building, First Floor
500 East Capitol Avenue
Pierre, South Dakota 57501-5070

RECEIVED
DEC 22 2004
SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

Re: SBC Long Distance, Inc.
Amendment to Petition and Request for Expedited Action
File No. TC04-263

Dear Sir or Madam:

On behalf of SBC Long Distance, Inc., and pursuant to discussions between the undersigned attorney and the Commission's staff, SBC Long Distance, Inc. hereby amends the above-captioned Petition and Request for Expedited Action by incorporating by reference the contents of the enclosed Application of Southwestern Bell Communications Services Inc. d/b/a SBC Long Distance for a Certificate of Authority to Provide Resold and Facilities-Based Local Exchange and Exchange Access Telecommunications Services in the State of South Dakota (File No. TC04-029), received February 18, 2004. The Commission granted this Application on June 11, 2004.

An extra copy of the filing, together with a filing fee in the amount of \$250.00, is enclosed. Please date-stamp the extra copy and return it in the addressed, self-stamped envelope.

Should you have any questions about this matter, please contact the undersigned counsel.

Respectfully submitted,


HOLLAND & KNIGHT LLP

Eric Fishman, Esq.
Counsel to SBC Long Distance, Inc.

Enclosures

cc: Karen Kremer
Harlan Best
John J. Smith

2482610_v1

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

TC04-029

RECEIVED

FEB 18 2004

SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

In the Matter of the Application of)
Southwestern Bell Communications)
Services Inc. d/b/a SBC Long Distance)
for a Certificate of Authority to Provide)
Resold and Facilities-Based)
Local Exchange and Exchange Access)
Telecommunications Services)
in the State of South Dakota.)

Docket No. _____

APPLICATION

Southwestern Bell Communications Services Inc. d/b/a SBC Long Distance ("Applicant" or "SBCS") hereby applies for a Certificate of Authority to provide resold and facilities-based local exchange and exchange access services within the State of South Dakota, pursuant to SDCL 49-31-3 and ARSD 20:10:32:03. Applicant obtained a Certificate of Authority to provide resold interexchange service in South Dakota on August 18, 1997 in Docket TC97-132. In support of its Application for Certificate of Authority ("Application") to provide local and exchange access services, Applicant provides the following information:

1. ARSD 20:10:32:03(1), GENERAL INFORMATION

Applicant's name, address, telephone number facsimile number, E-mail address and business type are as follows:

Southwestern Bell Communications Services Inc.
5850 W. Las Positas Blvd.
Pleasanton, California 94588
Telephone: (925) 468-6209
Facsimile: (707) 435-6640
E-mail: nd1639@camail.sbc.com

2. ARSD 20:10:32:03(2), OFFICERS AND DIRECTORS

The names and business addresses of Applicant's officers and directors are as follows:

(a) Officers:

Yno Gonzalez
President
Southwestern Bell Communications Services
Inc. d/b/a SBC Long Distance
5850 W. Las Positas Blvd.
Pleasanton, CA 94588
Telephone No.: (925) 251-7500
Facsimile No.: (707) 435-6649

William H. McCracken
Comptroller
Southwestern Bell Communications Services
Inc.
d/b/a SBC Long Distance
5850 W. Las Positas Blvd.
Pleasanton, CA 94588
Telephone No.: (925) 468-5430
Facsimile No.: (707) 435-6659

John di Bene, Esq.
Vice President, General Counsel and Secretary
Southwestern Bell Communications Services
Inc. d/b/a SBC Long Distance
5850 W. Las Positas Blvd.
Pleasanton, CA 94588
Telephone No.: (925) 251-7410
Facsimile No.: (707) 435-6625

Janet M. Duncan
Treasurer
Southwestern Bell Communications Services
Inc. d/b/a SBC Long Distance
175 E. Houston St., Room 7-U-30
San Antonio, Texas 78205
Telephone No.: (210) 351-5961
Facsimile No.: (210) 351-3849

Larry Ruzicka
Vice President -- Taxes
Southwestern Bell Communications Services
Inc. d/b/a SBC Long Distance
175 E. Houston St., Room 8-P-60
San Antonio, Texas 78205
Telephone No.: (210) 351-3904
Facsimile No.: (210) 351-3968

Thomas S. Clemens
Assistant Treasurer
Southwestern Bell Communications Services
Inc. d/b/a SBC Long Distance
175 E. Houston St., Room 7-T-3
San Antonio, Texas 78205
Telephone No.: (210) 351-2482
Facsimile No.: (210) 228-1110

(b) Directors:

Yno Gonzalez
President
Southwestern Bell Communications Services
Inc. d/b/a SBC Long Distance
5850 W. Las Positas Blvd.
Pleasanton, CA 94588

William H. McCracken
Southwestern Bell Communications Services
Inc. d/b/a SBC Long Distance
5850 W. Las Positas Blvd.
Pleasanton, CA 94588

3. ARSD 20:10:32:03(3), NAME UNDER WHICH BUSINESS WILL BE CONDUCTED

Applicant will do business utilizing the fictitious, "doing business as" ("d/b/a") name of SBC Long Distance, which is registered as a fictitious name in the State of South Dakota as evidenced by documents filed in **Exhibit A**.

4. ARSD 20:10:32:03(4), CORPORATE INFORMATION

(a) Applicant does not maintain an office in South Dakota.

(b) Applicant is a wholly owned subsidiary of SBC Communications Inc.

(c) Applicant is a privately-held corporation incorporated under the laws of the State of Delaware on May 31, 1995. Applicant's Articles of Incorporation are attached as **Exhibit A**.

(d) A copy of Applicant's Certificate of Authority to transact business in South Dakota is attached as **Exhibit B**.

5. ARSD 20:10:32:03(5), TELECOMMUNICATIONS PROVISION EXPERIENCE

Applicant is currently authorized to provide resold interexchange service in all fifty (50) states. Applicant is authorized to provide resold local exchange service in New York and Oregon, and resold and facilities-based local exchange service in Colorado and Vermont. Applicant is making application for authority to provide resold and facilities-based local exchange service in thirty-seven (37) states outside of its parent corporation's (SBC Communications Inc.) service area. A list of current and pending telecommunications authorizations, indicating the types of service and the dates and nature of state or federal authorization to provide the services is attached hereto as **Exhibit C**.

6. ARSD 20:10:32:03(6), APPLICANT'S AFFILIATES, SUBSIDIARIES AND PARENT ORGANIZATIONS

(a) Affiliates

The names and addresses of Applicant's affiliates are attached hereto as **Exhibit**

D.

(b) Subsidiaries

Applicant has no subsidiaries

(c) Parent Organization

Applicant is a wholly-owned subsidiary of:

SBC Communications Inc.
175 E. Houston St., Room 7-U-30
San Antonio, Texas 78205

7. ARSD 20:10:32:03(7), DESCRIPTION OF SERVICES TO BE OFFERED AND THE MEANS BY WHICH SERVICES WILL BE PROVIDED

Applicant proposes to operate as a Competitive Local Exchange Carrier offering competitive facilities-based and non-facilities based local exchange services. Applicant's services, include, but are not limited to basic local exchange service, custom calling features, CLASS services and data services. Applicant will serve residential and business customers. A more complete listing of Applicant's proposed services may be found in Applicant's proposed local exchange tariff, attached hereto as **Exhibit G**. Applicant also proposes to provide exchange access services to interconnecting carriers pursuant to the rates, terms and conditions in an access services tariff to be filed with the Commission after Applicant's Certificate of Authority has been issued.

7. ARSD 20:10:32:03(7), DESCRIPTION OF SERVICES TO BE OFFERED AND THE MEANS BY WHICH SERVICES WILL BE PROVIDED, Continued

Applicant proposes initially to provide facilities-based local exchange services using Unbundled Network Elements - Platform (UNE-P) leased or purchased from South Dakota certificated facilities-based local exchange carriers. Applicant may further resell the local exchange services of other South Dakota certificated local exchange carriers. Initially, facilities to be used in Applicant's provision of local services will be those of its underlying carrier(s). Applicant may purchase switching equipment and network facilities, or construct network facilities in the future.

8. ARSD 20:10:32:03(8), SERVICE MAP OR NARRATIVE DESCRIPTION INDICATING WITH PARTICULARITY THE GEOGRAPHIC AREA PROPOSED TO BE SERVED

Applicant proposes to provide service throughout the area in South Dakota currently served by Qwest Communications Corporation.

9. ARSD 20:30:32:03(9), INFORMATION REGARDING TECHNICAL COMPETENCE TO PROVIDE LOCAL EXCHANGE SERVICES

(a) Description of the Education and Experience of Applicant's Senior Management

Applicant's executive officers have been recruited from the parent company and its affiliates and are among its key managers. Together, Applicant's executive officers have several decades of experience in the telecommunication industry, including operations, interconnection, network, marketing, sales, finance, regulatory and legal issues. The executive officers, consequently, have the managerial ability to operate the company and provide the services that Applicant proposes to provide within South Dakota. Biographies of Applicant's senior management are attached hereto as **Exhibit E**.

9. ARSD 20:30:32:03(9), INFORMATION REGARDING TECHNICAL
COMPETENCE TO PROVIDE LOCAL EXCHANGE SERVICES

(b) Information Regarding Policies, Personnel, or Arrangements Made by the Applicant Which Demonstrate Applicant's Ability to Respond to Customer Complaints and Inquiries Promptly and to Perform Facility and Equipment Maintenance Necessary to Ensure Compliance With Any Commission Quality of Service Requirements

1. Ability to Respond to Customer Complaints

Applicant's Customer Service personnel are available twenty-four (24) hours per day, seven (7) days per week to respond to Customer complaints and inquiries. Reports of network problems and repair issues may be made to the Company's toll free number, (877) 585-2220. Customer billing and service inquiries may be made to the Company's toll free number, (877) 366-3200. Applicant has operated as a resale interexchange service provider in South Dakota since 1997 and has incurred customer good will through its commitment to customer satisfaction. Applicant's records show that to date, no customer complaints have been forwarded by the Commission to the Applicant for resolution.

2. Ability to Perform Facility and Equipment Maintenance

As a UNE-P and resale-based provider of local exchange service, Applicant does not initially plan to own, operate or or maintain its own network. Thus, Applicant is dependent upon technical personnel employed by its underlying carrier(s) to provide facility and equipment maintenance necessary for compliance with Commission quality of service requirements.

10. ARSD 20:30:32:03(10), INFORMATION EXPLAINING HOW THE APPLICANT WILL PROVIDE CUSTOMER WITH ACCESS TO EMERGENCY SERVICES, OPERATOR SERVICES, DIRECTORY ASSISTANCE AND TRS

Applicant plans to contract with the LEC to provide customers with access to emergency services such as 911 or enhanced 911. Applicant plans to contract with the LEC and/or Applicant's underlying carrier(s) to provide access to operator services, interexchange service, directory assistance, and telecommunications relay services. Applicant's customers may subscribe to the interexchange carrier of their choice and will be able to access interexchange service via Applicant's underlying carrier and UNE-P networks.

11. ARSD 20:30:32:03(11), FINANCIAL INFORMATION

Applicant's financial standing is impeccable as demonstrated by the financial statements of its parent company, SBC Communications Inc., attached hereto as **Exhibit F**. As a wholly-owned subsidiary of SBC Communications Inc., and as a well established entity, Applicant imposes no financial risks to the public or interconnecting carriers. Additional SBC Communications Inc. financial information is available at http://www.sbc.com/investor_relations/.

12. ARSD 20:30:32:03(12), INTERCONNECTION INFORMATION

(a) Identity of Local Exchange Carriers with Which Applicant Intends to Connect

At this time, Applicant intends to interconnect with Qwest Communications Corporation. Applicant also may interconnect with one or more South Dakota certificated facilities-based Competitive Local Exchange Carriers.

12. ARSD 20:30:32:03(12), INTERCONNECTION INFORMATION, Continued

(b) Timing of Initiation of Interconnection Service and Timing of Negotiations

Applicant has not yet begun negotiations with any carrier(s) for interconnection, but expects to initiate negotiations within six (6) months of the granting of Applicant's Certificate of Authority. Applicant estimates that initiation of interconnection should occur within twelve (12) months of the granting of Applicant's Certificate of Authority.

13. ARSD 20:30:32:03(13), PROPOSED TARIFF

Applicant's proposed local exchange tariff is attached as **Exhibit G**.

14. ARSD 20:30:32:03(14), COST SUPPORT

Applicant expects to serve less than fifty-thousand local exchange subscribers in the State of South Dakota. Thus, no cost support information for its rates is submitted herewith.

15. ARSD 20:30:32:03(15), MARKETING PLAN

Applicant plans initially to market its services to commercial customers of SBC Communications Inc. ("SBC"), its parent company, in SBC's in-region territories that have a need for local exchange services in South Dakota. Applicant does not currently plan to engage in multi-level marketing. No brochures have been developed to assist in sales of Applicant's service.

16. ARSD 20:30:32:03(16), SERVICE IN RURAL AREAS

Applicant is not seeking authority to provide service in the service area of a rural telephone company.

17. ARSD 20:30:32:03(17), CURRENT SERVICE PROVISION AND STATEMENTS RE: DENIAL OF SERVICE AND GOOD STANDING

A list of states where Applicant is registered or certified to provide service may be found in **Exhibit C**. Applicant has not been denied registration or certification in any state. Applicant is in good standing with the regulatory agencies in all states where it is registered or certified to provide service.

18. ARSD 20:30:32:03(18), CONTACT INFORMATION FOR COMPANY REPRESENTATIVES FOR CONSUMER COMPLAINTS AND REGULATORY ISSUES

All Commission inquiries and correspondence regarding customer complaint issues should be directed to:

Ann Kwong
Project Administrator - Regulatory
Southwestern Bell Communications Services Inc.
5850 W. Las Positas Blvd.
Pleasanton, CA 94588
Telephone: (800) 704-1465
Facsimile: (707) 427-7772
E-mail: regucomplaints@camail.sbc.com

All Commission inquiries and correspondence regarding on-going regulatory issues should be directed to:

Norman W. Descoteaux, Associate Director – Regulatory
Southwestern Bell Communications Services Inc.
5850 W. Las Positas Blvd., NE137
Pleasanton, CA 94588
Telephone: (925) 468- 6209
Facsimile: (707) 435-6640
E-mail: nd1639@camail.sbc.com

19. ARSD 20:30:32:03(19), BILLING AND COLLECTION OF CHARGES

Applicant will bill customers directly.

20. ARSD 20:30:32:03(20), APPLICANT'S POLICY RE: SOLICITATION OF NEW CUSTOMERS AND EFFORTS USED TO PREVENT UNAUTHORIZED SWITCHING OF CUSTOMERS BY APPLICANT, EMPLOYEES AND AGENTS

Applicant plans initially to market its services to commercial customers of SBC Communications Inc. ("SBC"), its parent company, in SBC's in-region territories that have a need for local exchange services in South Dakota. Applicant utilizes third party verification and signed Letters of Authorization to verify customer subscription to its services. In an instance where a customer claims that it did not subscribe to the Company's services, Applicant's Customer Service staff has access to tapes containing the recordings of third party verifications and Letters of Authorization and will send the appropriate customer verification or authorization to the complaining customer. Applicant's staff who are found to have switched a customer to Applicant's services without being authorized to do so are disciplined and undergo a review of customer solicitation procedures on the first instance. Personnel having repeated instances of unauthorized customer switching may be terminated from employment.

21. ARSD 20:30:32:03(21), THE NUMBER AND NATURE OF COMPLAINTS FILED AGAINST APPLICANT IN ANY STATE OR FEDERAL COMMISSION RE: UNAUTHORIZED SWITCHING OF CUSTOMER'S TELECOMMUNICATIONS PROVIDER AND THE ACT OF CHARGING CUSTOMERS FOR SERVICES NOT ORDERED

As a nationwide interexchange carrier, Applicant has more than 13 million lines PIC'd to SBCS. Applicant has not knowingly switched a customer's carrier without the customer's consent. However, even with the safeguards that SBCS has in place, there may be instances when we will be unable to locate the complete customer verification when a customer complains that they were switched to SBCS in error. We routinely review and improve our practices to minimize any situations where the customer might feel they were switched to us without their consent. Applicant has a no-tolerance policy against both slamming and cramming, and reviews complaints to take actions necessary to prevent future allegations.

When Applicant has determined that a customer was switched to SBCS and cannot locate proper customer verification information, federal and state rules are complied with to ensure the customer is returned to the carrier of their choice and is not charged for any calls placed.

Following is a summary of information filed with the FCC regarding slamming complaints for the period of July 1 through December 31, 2002. During this six-month period, SBCS received 2,917 slamming complaints (146 of these allegations were referred to Applicant by governmental agencies, the remainder were from direct customer contact). Of these allegations, 1,122 were found to be lacking sufficient customer verification (approximately .018% of the lines Pic'd to Applicant). In these cases, proper action was taken to ensure that the customer was returned to their previous carrier and was not charged for any calls placed using

21. ARSD 20:30:32:03(21), THE NUMBER AND NATURE OF COMPLAINTS FILED AGAINST APPLICANT IN ANY STATE OR FEDERAL COMMISSION RE: UNAUTHORIZED SWITCHING OF CUSTOMER'S TELECOMMUNICATIONS PROVIDER AND THE ACT OF CHARGING CUSTOMERS FOR SERVICES NOT ORDERED, Continued

SBCS. The majority of the allegations proved to be valid switches of the customer's carrier, and over 95% of the slamming complaints were resolved directly with consumers.

Applicant was the subject of an investigation in Oklahoma by the Consumer Services Division of the Oklahoma Corporation Commission ("OCC"). The investigation also included charges against six other long distance carriers. SBCS has since settled this matter with the Consumer Services Division of the OCC. The settlement order was accepted by the Administrative Law Judge and the OCC signed the final settlement order on January 23, 2003. In the settlement order, SBCS did not admit to any liability, and the settlement amount was a voluntary payment of \$10,000.00. Applicant avers to comply with federal regulation governing unauthorized customer transfers, 47 C.F.R. §64.1100 *et seq.*, and concomitant Commission regulation.

22. ARSD 20:30:32:03(22), REQUEST FOR WAIVER OF RULES

Applicant is not requesting the waiver of any Commission rules.

23. ARSD 20:30:32:03(23), FEDERAL TAX IDENTIFICATION NUMBER

Applicant's Federal Tax Identification Number is 74-2746907.

24. ARSD 20:30:32:03(24), OTHER INFORMATION

Commission approval of the instant Application will bring the following long-term benefits to the public:

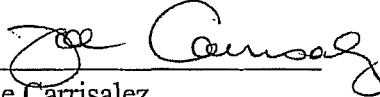
- (i) greater value to subscribers through lower-priced, better quality services;
- (ii) innovative telecommunications services;
- (iii) increased consumer choice in telecommunications service and alternative billing options;
- (iv) efficient use of existing telecommunications resources, as well as increased diversification and reliability in the supply of telecommunications services;
and
- (v) additional access revenues to local exchange providers.

[SIGNATURE NEXT PAGE]

WHEREFORE, Southwestern Bell Communications Services Inc. d/b/a SBC Long Distance respectfully requests the South Dakota Public Utilities Commission grant it a Certificate of Public Convenience and Necessity authorizing the provision of competitive resold and facilities-based local exchange and exchange access services within the State of South Dakota.

Respectfully submitted this 10th day of February 2004.

Southwestern Bell Communications Services Inc.

By: 
Joe Carrisalez
Executive Director - Regulatory
5850 W. Las Positas Blvd.
Pleasanton, CA 94588
Tel. No.: (925) 468-5128
Fax. No.: (707) 435-6623

Miller Isar, Inc.
7901 Skansie Ave., Suite 240
Gig Harbor, Washington 98335
(253) 851-6700

Applicant's Regulatory Consultants

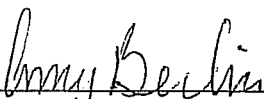
VERIFICATION OF APPLICANT

STATE OF CALIFORNIA)
) ss.
COUNTY OF ALAMEDA)

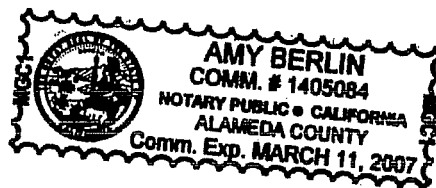
I, Joe Carrisalez, being first duly sworn and deposed, state that I am Executive Director – Regulatory of Southwestern Bell Communications Services Inc. d/b/a SBC Long Distance, the Applicant in the proceeding entitled above, that I have read the foregoing application and know the contents thereof, and as to those matters that are therein stated on belief, I believe them to be true.


Joe Carrisalez
Executive Director - Regulatory
Southwestern Bell Communications Services Inc.

Subscribed and sworn to before me this 10th day of FEBRUARY, 2004.


Notary Public in and for the State of California,
residing at: 1647 Paseo Laguna Seco
LIVERMORE, CA 94551

My Commission expires: 3/11/2007



BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

In the Matter of the Application of)
Southwestern Bell Communications)
Services Inc. d/b/a SBC Long Distance)
for a Certificate of Authority to Provide)
Resold and Facilities-Based)
Local Exchange and Exchange Access)
Telecommunications Services)
in the State of South Dakota.)

Docket No. _____

LIST OF EXHIBITS

- | | |
|-----------|--|
| EXHIBIT A | ARTICLES OF INCORPORATION AND
EVIDENCE OF TRADE NAME REGISTRATION |
| EXHIBIT B | CERTIFICATE OF AUTHORITY |
| EXHIBIT C | LIST OF CURRENT AND PENDING
TELECOMMUNICATIONS AUTHORIZATIONS |
| EXHIBIT D | AFFILIATES |
| EXHIBIT E | SENIOR MANAGEMENT BIOGRAPHIES |
| EXHIBIT F | SBC COMMUNICATIONS INC.'S FINANCIAL
INFORMATION |
| EXHIBIT G | PROPOSED LOCAL EXCHANGE TARIFF |

Statistics by Client

Matter List Client Summary Open Invoices

Client Name Toro Company, The
Client Number 054051

Accounts Receivable*		01	to	07	2004	_ New Period]	07/04	01/04-07/04	0
AR Fees	5,862.99	Hours Worked					<u>6.00</u>	<u>52.10</u>	
AR Cost	47.71	Hours Written Down/Up					0.00	0.00	
AR Other	0.00	Worked Amount					<u>2,046.50</u>	<u>14,795.00</u>	
AR Rets	0.00	Fees Billed (Actual Value)					<u>945.50</u>	<u>16,294.50</u>	
Total AR	<u>5,910.70</u>	Fees Billed (Original Value)					<u>945.50</u>	<u>16,294.50</u>	
		Fees Billed (Std Value)					<u>945.50</u>	<u>16,294.50</u>	
Write-Offs*		Fees Billed Yield (Std)					<u>100.00</u>	<u>100.00</u>	
W/O Fees	0.00	Fees Received					<u>396.00</u>	<u>21,797.00</u>	
W/O Cost	0.00	Costs Written Down/Up					0.00	<u>(0.64)</u>	
W/O Other	0.00								
Total W/O	0.00								
Unbilled*									
UB Hours	9.20								
UB Fees	3,274.00								
UB Cost	67.80								
Total UB	<u>3,341.80</u>								

*** These figures are current as of the snapshot date. They do not change as the period range changes. 12/20/2004**

**MILLER
ISAR** INC.
REGULATORY CONSULTANTS

STACEY A. KLINZMAN

7901 SKANSIE AVENUE,
SUITE 240
GIG HARBOR, WA 98335
TELEPHONE: 253.851.6700
FACSIMILE: 253.851.6474
HTTP://WWW.MILLERISAR.COM

Via Overnight Delivery
May 28, 2004

Ms. Pam Bonrud, Executive Secretary
South Dakota Public Utilities Commission
State Capitol Building, 1st Floor
500 East Capitol Avenue
Pierre, South Dakota 57501

RECEIVED
JUN 01 2004
SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

RE: Southwestern Bell Communications Services Inc. d/b/a Southwestern Bell Long Distance ("SBLD") – Request for Amendment Permitting Collection of Deposits and Advance Payments to Order Granting Certificate of Authority in Docket No. TC 97-132

Dear Ms. Bonrud:

With this letter, SBLD requests that South Dakota Public Utilities Commission ("Commission") amend its order issued August 27, 1997 in Docket No. 97-132 ("the Interexchange Order") to permit SBLD to collect advance payments and deposits from its South Dakota customers. In support of its request for amendment, SBLD provides the following information:

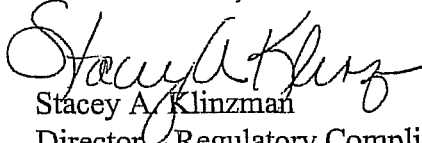
1. SBLD was granted authority to provide resold intrastate long distance services in the Interexchange Order.
2. After the issuance of the Interexchange Order, SBLD filed with the Commission bond no. 6070970, issued June 21, 2000, in the amount of \$25,000.00, for purposes of complying with Commission rules regarding the collection of advance payments and deposits.
3. Staff recently made SBLD aware that the Interexchange Order had not been amended to permit the collection of advance payments and deposits after the filing of bond no. 6070970.
4. SBLD has not, to date, collected advance payments or deposits from its South Dakota customers.

Ms. Pam Bonrud
(Date)
Page 2 of 2

As indicated by the facts set forth above, SBLD has complied with Commission rules and regulations for collection of advance payments and deposits. Thus, SBLD respectfully requests that the Interexchange Order be amended to permit it to collect advance payments and deposits from its South Dakota customers.

Please acknowledge receipt of this filing by file-stamping and returning the additional copy in the self-addressed, postage-paid envelope provided for this purpose. Questions regarding this request for amendment to the Interexchange Order may be directed to me at the telephone or facsimile numbers above, or via electronic mail at sklinzman@millerisar.com.

Sincerely,
MILLER ISAR, INC.


Stacey A. Klinzman
Director - Regulatory Compliance

Regulatory Consultants to
Southwestern Bell Communications Services, Inc.

cc: Norman W. Descoteaux, Associate Director - Regulatory, Southwestern Bell
Communications Services Inc.

VOUCHER NO.	INVOICE NO.	G/L NO.	DESCRIPTION	AMOUNT
1411415	122104h	0110461000000000000000000000	61042.00007 -- Filing fee for SBC Telecom.	250.00
TOTAL				\$250.00

HOLLAND & KNIGHT LLP

2115 HARDEN BOULEVARD
 LAKELAND, FLORIDA 33803-5918
 (863) 682-1161

Wachovia
 St. Petersburg, FL

63-751/631

80010751

VOID AFTER 180 DAYS

U.S. FUNDS

DATE

12/21/04

AMOUNT

\$250.00

P
 A TWO HUNDRED FIFTY AND 00/100
 Y

TO THE
 ORDER
 OF

South Dakota Public Utilities Commission
 500 East Capitol Avenue
 Pierre, SD 57501-5070

TWO SIGNATURES REQUIRED ON CHECKS OVER \$2,500



⑈80010751⑈ ⑆063107513⑆ 2090002390441⑈